

David Stephenson, MD, MS, PhD (student)
Healthcare Consultant
e-MPower Health
900 Arnold Ave
Utica, NY 13502
469-400-9957
Docstat61@gmail.com

Pro Se *amici curiae*

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

In re: The Conservatorship of:

BRITNEY JEAN SPEARS,

Conservatee

Case No. BP 108 870

SUPPLEMENT TO:

PETITION TO TERMINATE CONSERVATORSHIP
OF THE PERSON AND ESTATE,

Dated: September 21, 2021

- 1) Dr. David Stephenson (Dr. Dave) is a trained medical doctor with 15 years of clinical practice in emergency rooms and additional credentials of a Master of Science in Tele-health (Health informatics) and is a senior PhD student in healthcare services. He has subject matter expertise in the medical and legal aspects of the instant case, and he wishes to provide further perspective from a different vantage point. As the author of this petition, he relies on the inherent power of this court to excuse his non-legal style of writing in favor of using creative elements and a tongue-in-cheek manner at times. This fact should not take away from the facts and expert opinions he is offering.
- 2) There is insufficient evidence that Britney needs a Probate Conservatorship, and it was an abuse of discretion by Judge Reva Goetz when the initial order for the temporary conservatorship was placed without probing the motives of those individuals initiating the conservatorship; without checking the credentials of the declarant physician doing the capacity evaluation; and by appointing Mr. Ingham as Britney's lawyer over her personal choice of Mr. Streisand. This last point is argued in other petitions, and nothing further will be added here on that point.

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- 1 3) The physician, Dr. James Edward Spar, went outside his area of expertise when making the declaration
2 that extended the conservatorship. Dr. Spar is a Geriatrician, and his practice is limited to the care of the
3 elderly who are the population affected by severe neuro-degenerative conditions like dementia. He is an
4 author of journal articles related to the evaluation of mental capacity of individuals involved in probate
5 court matters but is solely based on experiences of geriatric clients.
- 6 4) For the proponents of this conservatorship, there is no apparent appreciation for the (self-evident) fact that
7 Britney is a highly functional, productive artist which belies any claim that she does not have the capacity
8 to make decisions for herself. According to an authority on the Probate Code (1): the eligibility criteria is
9 the inability to properly provide for basic needs such as “physical health, food, clothing, and shelter” and
10 where the subject “is substantially unable to manage financial affairs, and to resist fraud or undue
11 influence”. Further, the subject is generally someone suffering from a major neuro-degenerative disorder
12 like dementia.
- 13 5) Generally, in the young, severe mental conditions like dementia that would be appropriate for a probate
14 conservatorship are rare and caused by genetic factors or metabolic diseases and would require extensive
15 workup (2). There are no reports of Britney having any neurodegenerative conditions in her family history.
16 If that were the case it would have been most likely reported like every other aspect of her life. If she has
17 a metabolic disease, there are millions of people who would like to have the same, as her health, energy
18 level and vitality have never been an issue other than those times when she was heavily sedated with
19 psychotropics. In addition, it seems doubtful that Dr. Spar has any appreciation for the fact that young
20 minds like Britney’s are responsive to behavioral and lifestyle changes alone—a condition called
21 neuroplasticity that is a well-known phenomenon in the neurological sciences.
- 22 6) Regarding the ability for Britney to provide basic needs such as physical health, food, clothing, and
23 shelter: she is the embodiment of physical health; she hires people to prepare food for her, and when they
24 are not available, she knows how to drive her Mercedes through the fast-food lane; her clothes shopping is
25 legendary and can be verified by Versace, Louis Vuitton and other Rodeo Drive merchants; and she owns
26 her own mansion. This part of the probate code can be put to rest.
- 27 7) The undue influence portion of the probate code is more complicated from a medico-legal standpoint.
28 From Dr. Spar’s most recent published articles related to practitioner’s making capacity declarations (3):
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1 when the issue is undue influence, he does not believe the treating physician should be the one making the
2 judgement because they may be influenced too much by family members. Instead, it should be left to an
3 independent evaluator (like himself). This stance is a new one being promoted by him and is opposed by
4 the “IPA task force” recommendations, and both the American Bar and American Psychological
5 Associations (pg. 350). A commonsense approach to making decisions about undue influence would
6 require an evaluation of whether the influencer (usually family members) has an agenda. The jury is still
7 out on whether the treating provider is the one to make the call or whether it be someone like Dr. Spar.
8 What if Dr. Spar however is the one with an agenda? What he proposes would certainly concentrate the
9 decision-making power in too few hands and could certainly lead to corruption. Possibly he is suggesting
10 that only those qualified to make these decisions would be highly degreed practioners of both law and
11 medicine that you would only find at academic centers (which are places constantly looking for more
12 funding). In his academic writing Dr. Spar seems to be promoting his own agenda with his unsupported
13 stance around the role of a non-treating practitioner vs an independent evaluator such as himself. Maybe
14 he is right or maybe he will be using this self-appointed power to have leverage where there are large
15 fortunes at stake and too many others willing to cut shady deals. Who knows? Anytime there is
16 concentrated, unbalanced power, this kind of thing is possible. There is no harm in having the author, with
17 his own medico-legal knowledge, to point this out. It is important to get this kind of thing right given the
18 potential for corruption and abuse. For instance, it is said that Britney herself is reportedly missing up to
19 \$600 million that is unaccounted for. This kind of money provides a lot of motivation for abuses of power
20 when the decision-making authorities are confined to a few individuals who are not accountable to anyone.

21 8) In as far as any proclivity to be unduly influenced by others to the point of being exploited: it is not
22 supported by any known facts—even though Britney lived a life under the microscope. Even though her
23 spending sprees can be taken by some as excessive, when it is put in the light of her enormous wealth and
24 prospects for continued earning with both music and product endorsements. Britney has the reputation of
25 everything she touches turning to gold—not just music either as she has endorsements for a perfume line
26 that is said to be in the hundreds of millions, even billions of dollars in revenue (4). In a free society it is
27 not appropriate for anyone to impose their opinions as to what another individual spends the fruit of their
28 own labor on.

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- 1 9) Ironically, the only evidence of exploitation to Britney has come about by those who benefit financially
2 from the 13 ½ year conservatorship. This has been revealed in documentaries such as that featured on
3 Netflix by the New York Times: *Framing Britney Spears*, which has been viewed around the globe. There
4 is also many media reports and much news on social media from witnesses to the abuses. Most notably is
5 the testimony of Britney herself live in court on June 23rd. Here are some snippets:
6 “I’ve been in denial”; “I can’t sleep”; “I’m depressed”; “I’m traumatized”; “I’m in shock”; and “I am so
7 angry its insane”. When rationalizing why everything has happened, she states: “I honestly think they are
8 trying to kill me”. She also added that she had previously complained to this court about the abuses, but it
9 fell on deaf ears.
- 10 10) While Britney was clearly experiencing barriers to success in her personal life, those barriers were largely
11 external—not internal—created by a mob of paparazzi that constantly stalked her, and family,
12 acquaintances and managers who only looked at her as a “cash cow” or “ATM”.
- 13 11) Britney is not only a world renown “pop star”, she is also a human with social and emotional needs and
14 she like anyone else is likely to have periods of self-doubt, trouble coping and at times even a depressed
15 mood. She is not a circus animal to be worked tirelessly without usual human care, but that is what she
16 and others have reported.
- 17 12) The reported mental breakdowns where she made “bad judgements” like cutting off her hair, driving with
18 her child in her lap, or locking herself in a bathroom are pedestrian mental health events and do not
19 require anything approaching the harsh “sentence” she has received. In addition, it appears that Britney
20 was experiencing post-partum depression, having just delivered two boys with successive pregnancies.
21 Anyone with an ounce of compassion could understand trying to protect a suckling child in the arms of a
22 new mother, which was the case when Britney was taken from her home on an emergency 5150 hold.
23 Maternal instincts require that she would not want to give up her baby.
- 24 13) In fact, any mental health concerns Britney had could have easily been managed by a health professional
25 invested in putting Britney on a path to success in both her private and public lives. Further, it could have
26 been managed in the privacy of her home through a tele-health electronic and/or mobile platform or with
27 home visits from a provider given her resources. This would obviate the need to parade her in front of
28

1 paparazzi for mental healthcare visits out in the community. She spoke of this embarrassing situation on
2 June 23rd.

3 14) It is a fact that Britney has suffered immensely during the 13 ½ years of the conservatorship. The best
4 illustration of this is her own words: "I honestly think they were trying to kill me". During her testimony
5 on June 23rd, her entire speech was cogent and coherent even to someone not trained in the clinical
6 interview. No diagnosis or declaration of capacity precludes an individual from being taken seriously
7 when they are expressing physical or emotional harm in such a convincing manner. But it was not the first
8 time she had expressed such to the court, but it fell on the deaf ears of this court and her personal attorney.

9 15) Here are the harsh conditions imposed on her during the conservatorship thus far:

10 a) social isolation-she was cut off from her usual social support connections.

11 b) loss of autonomy over her body-she was forced to have treatment and medications she did not
12 want and had loss of her reproductive rights.

13 c) restriction of movement and freedom-she is guarded 24/7 by security guards who enforce the
14 restrictions on her movements out of the house such as going for a drive with her boyfriend. All
15 this even though Britney is not a criminal and she is a threat to no one and certainly no one is
16 trying to harm her intentionally (although it might be possible for her to be suffocated from all the
17 hugs her fans want to give her due to the abuses she has been going through).

18 d) inability to benefit from the fruits of her hard labor- having others around you benefitting more
19 than you from your work must be quite distressful. Her hard work is detailed in paragraph 16.

20 16) All these conditions are individually damaging to one's psyche and collectively much more so. Worse of
21 all is the way Britney was gaslighted and forced into treatment with heavy psychotropic medications she
22 did not need. There seems to have been a concerted effort to convince Britney that she had a serious,
23 irreversible mental condition, such that at the age 26 years old, the best years of her life were already
24 behind her and there would be limited quality time with her beloved children in the future. These are facts
25 that can easily be inferred when one's own father, family, managers, personal lawyer and even personal
26 doctor are in on the profitable scheme through not only words but heavy actions.

27 17) One measure of someone's work ethic is the work product and for Britney, her hard work has placed her
28 into the very fabric of the world music scene. On Google, one just needs to type in the first name Britney
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to get information about her. Here is a reminder to Dr. Spar and the judges responsible for this conservatorship for the last 13 ½ years, as to the top accomplishments of *their* conservatee (5):

- Her debut album is one of the bestselling in history
- Her “Baby One More Time” hit is the best-selling single of all time and has the singular distinction of being the #1 hit in every country that charted it
- The accompanying video (in the authors experience) was so impactful that it started a noticeable change in school age girls in the way they dressed, in their attitudes and in confidence levels as they continued to be influenced by Britney
- Her highly successful debut is a product of Britney’s appreciation for first impressions and athletic skill added to musical performance and is a testament to her work ethic even as a child. She didn’t just knock it out of the park; she knocked the “crap” out of it, out of the park. The world took notice.
- Her album “Blackout” has been added to the Rock and Roll Hall of Fame and it ironically was created the same year she was undergoing the “mental breakdowns” that led to the 5150 holds and eventually to the conservatorship
- Her musical videos have been awarded MTV’s highest honors and she has given iconic performances at VMA productions. She has also won a Grammy—the highest achievement in the music industry
- She is the youngest artist to ever get a star on the Hollywood Walk of Fame
- Her fragrance line has grossed over \$1.5 billion worldwide
- She has had a successful comeback despite the constraints of the conservatorship. The “Piece of Me” show in Las Vegas grossed approximately \$138 million over a period of 4 years during which time she only went out on the town twice (6)
- She is known worldwide as the “Princess of Pop” and has an Instagram (IG) following of over 34 million fans which is growing every day. There are groups on IG. She most likely is the most photo or video graphed person in the world.

18) Thus, when Britney sings: “You Better Work Bitch”—it comes from a place she knows well. Never has it been heard by someone standing in line to see Britney: “I can’t wait to see what Britney’s management has done” or “I spent all this money because Jamie is the greatest person and I want to see what he has helped create”. No, all the fans are there solely to see Britney. Period. She deserves every penny coming to her.

19) The personal conservator in Britney’s case is not qualified to handle the task and should be removed. Britney is vulnerable to misuse by the medical profession due to her fame and wealth and potential need for future mental health services as an occupational hazard (largely because of external factors that go with the life of a “rock star”). It is apparent that the personal conservators of Britney have participated in “doctor shopping” and have only employed those physicians willing to support the enterprise which Jodi Montgomery has benefitted from immensely. The enterprise even brazenly has its own motto: isolate, medicate, liquidate. A motto that has been seen often on social media.

20) Few people in history have had to deal with the amount of fame that comes with being a musical icon — too many of them have checked out of this world well before normal life expectancy. Thus, the position of

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1 personal conservator for Britney will require that they have enough medical knowledge to both seek
2 appropriate care when it is needed and to step in and question the care when it is not needed. This is called
3 a gatekeeper function, which is usually a general care physician. Case in latter point: the well documented
4 involuntary admission to a mental health facility when Britney was charged \$60,000 for the month out of
5 her own pocket and the use of first generation psychotropics (Lithium) that are rarely used and only in the
6 most severe, intractable mental health cases.

- 7 21) Britney has a loyal base of millions of fans who love and adore her both as a person and a performer.
8 Many of them are trustworthy professionals who would never think to exploit her in the way she has been
9 for the last 13 ½ years: bludgeoned and defiled by unethical participants while this court has tied her
10 hands.

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12 **REASONS TO TERMINATE THE CONSERVATORSHIP OF BRITNEY SPEARS**

- 13 22) It has never been established why Britney needs a probate conservatorship and there is no compelling
14 legal or medical reason to be in one
- 15 23) The treatment of Britney under this unnecessary conservatorship has come at a great cost to her estate and
16 to her mental health and well-being
- 17 24) Jodi Montgomery and Jamie Spears do not have the best interest of Britney foremost and should be
18 removed
- 19 25) If Britney insists on having a conservator in her personal and professional capacity, there are plenty of
20 others who would fill the role responsibly (card enclosed)
- 21 26) There are better options available for Britney to assist her in becoming a strong, independent and
22 successful woman

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18 #FreeBritney

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20 David Stephenson, Pro Se

21 I, Dr. David Stephenson, a medical doctor and healthcare consultant, declare under the laws of the State of
22 California that the foregoing is true and correct.

23 Executed on September 21, 2021 at Utica, New York

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27 David Stephenson

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